

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CATHERINE ALEXANDER,	:
Plaintiff,	:
v.	:
TAKE-TWO INTERACTIVE SOFTWARE,	:
INC., 2K GAMES, INC., 2K	:
SPORTS, INC., WORLD WRESTLING	:
ENTERTAINMENT, INC., and	:
VISUAL CONCEPTS ENTERTAINMENT,	:
Defendants.	:

Zoom Video Deposition of

EDWARD M. KIANG

Tuesday, August 4, 2020

9:04 a.m. CST to 12:24 p.m. CST

Job No.: 311575

Pages: 1 - 122

Reported by: Melody Stephenson

BBA, FCRR, CRR, CRC, RPR, RSA, MO CCR #406

Transcript of Edward M. Kiang

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1 If there was historical context for an earlier 10:36:33
2 period in his life when he didn't have said 10:36:36
3 tattoos, it might've been approved. 10:36:38
4 Q (By Mr. Friedman) Looking at the way in 10:36:40
5 which the Orton character exists in the WWE 2K 10:36:42
6 Games, that Orton character contains tattoos, 10:36:49
7 isn't that right? 10:36:53
8 A That's correct. 10:36:54
9 Q So had that Orton talent model been 10:36:54
10 submitted to the WWE without any tattoos, would 10:36:59
11 WWE have approved it? 10:37:04
12 MR. KRASIK: Objection. Calls for 10:37:07
13 speculation, and now asked and answered. 10:37:08
14 You can answer it one more time. 10:37:11
15 A No, it would not have been approved for 10:37:13
16 the uses that are, you know, within the standard 10:37:15
17 play of the game. 10:37:20
18 Q (By Mr. Friedman) All right. Thank you. 10:37:20
19 Had the Orton talent model been submitted 10:37:22
20 with tattoos that were different from the tattoos 10:37:26
21 that Mr. Orton has in real life, would the WWE 10:37:29
22 have approved that talent model? 10:37:34
23 MR. KRASIK: Objection. Calls for 10:37:36
24 speculation. 10:37:39
25 A Again, without further context, we 10:37:40

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1 would've flagged it for further comment and tried 10:37:43
2 to ascertain why they would've made that change. 10:37:45

3 Q (By Mr. Friedman) All right. Given the 10:37:48
4 way in which the Orton character appears in the 10:37:51
5 WWE 2K Games, had that Orton character talent 10:37:55
6 model been submitted with tattoos that were 10:38:00
7 different from the tattoos Mr. Orton has in real 10:38:02
8 life, would the WWE have rejected that talent 10:38:04
9 model? 10:38:07

10 A That's correct. 10:38:08

11 MR. KRASIK: Objection. Calls for 10:38:09
12 speculation. 10:38:12

13 You can answer. 10:38:13

14 A That's correct. 10:38:13

15 Q (By Mr. Friedman) Had Take-Two submitted 10:38:13
16 a Randy Orton talent model in which his tattoos 10:38:21
17 were all blurred out, do you think WWE would've 10:38:28
18 approved that talent model? 10:38:31

19 MR. KRASIK: Objection. Calls for 10:38:35
20 speculation. 10:38:37

21 A I -- we would not have approved it unless 10:38:37
22 we had a reason to approve it. 10:38:40

23 Q (By Mr. Friedman) Now, given those 10:38:45
24 scenarios that we just discussed, why is it that 10:38:46
25 the WWE would not have approved a Orton talent 10:38:52

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